

FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Richard A. Passov, Treasurer
Pfizer Inc. PAC
235 East 42nd Street
New York, NY 10017

JIN 27 2001

Identification Number:

C00016683

Reference:

30 Day Post-General Report (10/19/00-11/27/00)

Dear Mr. Passov:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The totals listed on Lines 12 and 16, Column B of the Detailed Summary Page(s) appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.

-Schedule A of your report (pertinent portion(s) attached) discloses a receipt(s) of \$3,100 from Pfizer PAC-NY and Pfizer PAC-State. Please clarify whether this transfer(s) is from an account maintained by your committee for non-federal activity. If so, be advised that such a transfer is prohibited by 11 CFR §102.5(a)(1)(i) and the full amount of the transfer(s) should be returned to the non-federal account. Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out. In addition, the transfer-out should be disclosed on Schedule B supporting Line 22 of your next report.

If this transaction represents an "internal transfer" of funds from one federal account to another, and the source(s) of such funds has been identified in previous reports of receipts and disbursements, please note that such transfers should not be itemized as doing so inflates total receipts and cash on hand. If this is the case, please amend your report accordingly.

Although the Commission may take further legal action regarding the acceptance of funds from a non-federal account, your prompt transfer-out of the impermissible funds or clarification of the transaction, will be taken into consideration.

•The supporting schedule for loans and lines of credit from lending institutions (Schedule C-1) must include the name and address of the lender, amount, interest rate, date incurred, date due, the treasurer's signature, and the signature of an authorized representative of the lending institution, along with a copy of the loan agreement. In addition, it may be necessary to provide information regarding restructured loans, draws on lines of credit, secondary sources of repayment, traditional collateral, future receipts as collateral and other means of obtaining loans according to your activity. Please amend Schedule C-1 and any other affected schedules to provide the signature of an authorized representative of the lending institution and a copy of the loan agreement. If CFR §§100.7(b)(11) and 100.8(b)(12)

-Schedule B supporting Line 23 of your report discloses a contribution(s) to New Jersey Victory 2000 and Maine Victory 2000. Please clarify whether this is a federal committee(s), as there does not appear to be a committee(s) registered with the Commission under this name(s). In the event this is a non-federal committee(s), please disclose it on Schedule B supporting Line 29 of the Detailed Summary Page.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

Dominick Ciaraldi

Reports Analyst

Reports Analysis Division

	ZED RECEIPTS	Use separate schedule(s) for each category of the Datallad Summary Page	63 / 72
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Any information copied from such Reports and Statements me commercial purposes, other than using the name and address	ay not be sold or used by any person for the of any political committee to solicit contrib	ne purpose of soficiling contri sullans from such committee.	autions or for
NAME OF COMMITTEE (in Full) Pfizer PAC			
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SUBTOTALS of Receipts This Page (Optional)

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TOTALS This Period (last page this line number only)

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